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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

DAN BRANDON BILZERIAN, an individual,

Plaintiff,

v.

IGNITE INTERNATIONAL BRANDS, LTD., a
foreign corporation; IGNITE
INTERNATIONAL, LTD., a foreign corporation;
PAUL BILZERIAN, an individual; SCOTT
ROHLEDER, an individual; RUPY DHADWAR,
an individual,

Defendants.

Case No. 2:24-cv-2101-RFB-NJK

DECLARATION OF SCOTT ROHLEDER
IN SUPPORT OF IGNITE
INTERNATIONAL LTD.'S MOTION TO
DISMISS

I, Scott Rohleder, hereby declare the following is true and correct to the best of my knowledge:

1. At the time relevant to the complaint and until October 4, 2024, I was the President of Ignite International, Ltd. ("Ignite US"). In that capacity, I have personal knowledge of the facts and matters stated herein.

2. I am submitting this Declaration in Support of *Ignite US' Motion to Dismiss*, which seeks to dismiss the complaint against Ignite US for lack of personal jurisdiction pursuant to Fed. R. Civ. P. 12(b)(2), for improper venue pursuant to Fed. R. Civ. P. 12(b)(3), under the doctrine of *forum non conveniens*, and for failure to state a claim under Fed. R. Civ. P. 12(b)(6).

1 3. As alleged in the Complaint, Ignite US is a Wyoming corporation with its principal
2 office located at 3308 Towerwood Drive, Farmers Branch, TX, 75234, USA. I am informed and
3 believe that Ignite US was served with the Complaint and Summons in the above-captioned case
4 at its Texas office, as well as at the office of its registered agent located in Wyoming.

5 4. Ignite US is a wholly owned subsidiary of Ignite International Brands, Ltd, a
6 Canadian corporation (“Ignite International”). Rupy Dhadwar is the current CEO and President of
7 Ignite International. While Ignite International markets the “Ignite” brand across the globe, Ignite
8 US does not.

9 5. Ignite International is also a named defendant in the above-captioned action. Ignite
10 International has offices located at 675 Cochrane Drive, East Tower, Suite 639, Markham, Ontario
11 L3R 0B9, Canada. I am informed and believe that Ignite International has not been served with
12 any Complaint or Summons in this action and has not waived service.

13 6. Upon information and belief, Ignite US does not have affiliations contacts with
14 Nevada that are so continuous and systematic as to render it essentially at home in Nevada.

15 a. Ignite US does not manufacture its products in Nevada.

16 b. Ignite US does not have any officers or employees working on its behalf from
17 Nevada.

18 c. Ignite US does not continuously or systematically direct its business activities
19 specifically to Nevada. I am informed and believe that other than one business
20 transaction with a Nevada casino several years ago that was not fruitful. The claims
21 in the Complaint do not relate to that transaction. Ignite has not directed any
22 business specifically to Nevada.

23 d. Ignite US does not maintain any business records in Nevada.

24 e. Ignite US does not have a bank account in Nevada.

25 f. Ignite US does not hold annual or special meetings of its stockholders or directors
26 in Nevada.

27 g. Ignite US does not own any real property or have any leasehold interest in real
28 property located in Nevada.

h. While Ignite does have on-line marketing and sales of goods, the marketing and sales are not specifically directed to Nevada. The marketing and sales are globally directed.

i. Ignite is not a party to any other litigation in the courts located in the State of Nevada.¹

7. While Plaintiff suggests in his Complaint that Defendants are using Canadian courts against him, he fails to mention that he is the one who first sought relief there. In July 2024, Plaintiff Dan Bilzerian (“Plaintiff”), purporting to act on behalf of Ignite International, filed a petition against International Investments, Ltd. and the board of Ignite International in the Supreme Court of British Columbia, Canada. Later, in August 2024, Plaintiff, individually, filed another petition in the Supreme Court of British Columbia, Canada, this time he brought a petition on his own behalf against Ignite International, and other defendants, including its board (together, the “Canadian Proceedings”).

8. True and correct copies of Plaintiff’s filings and submissions in the Canadian Proceedings are attached hereto as follows:

- a. **Exhibit 1:** Petition to the Supreme Court of British Columbia, Vancouver Registry Case No. S-244508.
- b. **Exhibit 2:** Amended Petition to the Supreme Court of British Columbia, Vancouver Registry Case No. S-244508.
- c. **Exhibit 3:** Petition to the Supreme Court of British Columbia, Vancouver Registry Case No. S-245663.
- d. **Exhibit 4:** Amended Petition to the Supreme Court of British Columbia, Vancouver Registry Case No. S-245663.
- e. **Exhibit 5:** Dan Brandon Bilzerian’s Second Affidavit in Vancouver Registry No. S-245663, dated October 17, 2024.

¹ Ignite International Ltd. was named as a counter-defendant in one action in this district (Case No. 2:21-CV-1590 JCM (EJY)), but the court granted its motion to dismiss, on August 15, 2022. See, *Ignite Spirits Inc. v. Consulting by AR*, 2022 WL 3358459 (D. Nev. 2022).

1 f. **Exhibit 6:** Oral Reasons for Judgment in *Bilzerian v. Ignite International Brands,*
2 *Ltd., et al.*, Vancouver Registry No. S-245663.

3 9. Importantly, Plaintiff submitted a declaration in the Canadian Proceedings entirely
4 contradictory to the allegations of the Complaint in this action. *See* Exhibit 5. Specifically, Plaintiff
5 declared the following under oath, on October 17, 2024:

6 Given that the social media accounts primarily use and portray my name, picture
7 and likeness, to promote the Company's lifestyle products and brand, I have always
8 solely operated and currently operate and control the various social media accounts
including creating and approving all content. (Emphasis added.)

9 10. It was only on the heels of Plaintiff suffering several adverse rulings in the
10 Canadian action that Plaintiff filed his Complaint in the above-captioned case in the federal district
11 court located in Nevada. *See, e.g.*, Exhibit 6, where the court states at page 3, "I say D.B.'s overall
12 conduct has been an abuse of the court process."

13 I declare, pursuant to 28 U.S.C. Section 1746, under penalty of perjury under the laws of
14 the United States of America that the foregoing is true and correct and if called upon as a witness
15 I could and would competently testify thereto.

16 Executed this 17th day of December 2024.

17 
18 SCOTT ROHLEDER, Declarant